

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of the State of Texas, *et al.*,

*Defendants.*

CIVIL ACTION NO.  
3:21-cv-00259-DCG-JES-JVB  
[Lead Case]  
&  
All Consolidated Cases

**PLAINTIFFS' NOTICE OF JOINT FILING  
OF CHART OF CLAIMS**

Pursuant to the Court's Pretrial Scheduling Order, Plaintiffs hereby jointly file a chart summarizing which Plaintiff Groups are challenging which districts, and on which legal bases. *See* Doc. 880 at 5 (Pretrial Scheduling Order). The chart is presented in three parts – one for each challenged redistricting map. They are attached to this submission as Exhibits A-C.

Dated: May 14, 2025

Respectfully submitted,

**For LULAC Plaintiffs:**

**For Gonzales Plaintiffs:**

/s/ Nina Perales

/s/ David R. Fox

Nina Perales

David R. Fox\*

Julia Longoria

Richard A. Medina\*

Sabrina Rodriguez

Elias Law Group LLP

Mexican American Legal Defense  
and Educational Fund (MALDEF)

250 Massachusetts Ave. NW, Suite 400

110 Broadway Street, Suite 300

Washington, D.C. 20001

San Antonio, TX 78205

Telephone: (202) 968-4490

(210) 224-5476

dfox@elias.law

rmedina@elias.law

nperales@maldef.org  
jlongoria@maldef.org  
srodriguez@maldef.org

Ernest I. Herrera  
Mexican American Legal Defense  
and Educational Fund (MALDEF)  
634 S. Spring Street, 9<sup>th</sup> Floor  
Los Angeles, CA 90014  
(210) 629-2512  
eherrera@maldef.org

Andrea E. Senteno\*  
Mexican American Legal Defense  
and Educational Fund (MALDEF)  
1016 16<sup>th</sup> Street, Suite 100  
Washington, DC 20036  
(202) 293-2828  
Asenteno@maldef.org

Khrystan N. Policarpio\*  
Mexican American Legal Defense and  
Educational Fund (MALDEF)  
1512 14<sup>th</sup> Street  
Sacramento, CA 95814  
(916) 444-3031  
kpolicarpio@maldef.org

**For MALC Plaintiffs:**

/s/ Sean J. McCaffity  
George (Tex) Quesada  
State Bar No. 16427750  
Email: quesada@texttrial.com  
Sean J. McCaffity  
State Bar No. 24013122  
Email: smccaffity@texttrial.com  
3811 Turtle Creek Boulevard, Suite 1400  
Dallas, Texas 75219-4461  
214/720-0720 (Telephone)

Abha Khanna\*  
Elias Law Group LLP  
1700 Seventh Ave, Suite 2100  
Seattle, WA 98101  
Telephone: (206) 656-0177  
[akhanna@elias.law](mailto:akhanna@elias.law)  
Renea Hicks  
Attorney at Law  
Texas Bar No. 09580400  
Law Office of Max Renea Hicks  
P.O. Box 303187  
Austin, Texas 78703-0504  
(512) 480-8231  
rhicks@renea-hicks.com

**For Brooks Plaintiffs:**

/s/ Chad W. Dunn  
Chad W. Dunn (Tex. Bar No. 24036507)  
Brazil & Dunn  
4407 Bee Caves Road  
Building 1, Ste. 111  
Austin, TX 78746  
(512) 717-9822  
[chad@brazilanddunn.com](mailto:chad@brazilanddunn.com)

/s/ Mark P. Gaber  
Mark P. Gaber\*  
Mark P. Gaber PLLC  
P.O. Box 34481  
Washington, DC 20043  
(715) 482-4066  
[mark@markgaber.com](mailto:mark@markgaber.com)

Jesse Gaines\* (Tex. Bar. No. 07570800)  
P.O. Box 50093  
Fort Worth, TX 76105  
817-714-9988  
[gainesjesse@ymail.com](mailto:gainesjesse@ymail.com)

Joaquin Gonzalez  
Texas Bar No. 24109935  
1055 Sutton Dr.  
San Antonio, TX 78228  
[jgonzalez@malc.org](mailto:jgonzalez@malc.org)

**For Plaintiff Texas NAACP:**

/s/ Lindsey B. Cohan  
Lindsey B. Cohan  
Dechert LLP  
515 Congress Avenue, Suite 1400  
Austin, TX 78701  
(512) 394-3000  
[lindsey.cohan@dechert.com](mailto:lindsey.cohan@dechert.com)

Molly E. Danahy\*  
P.O. Box 51  
Helena, MT 59624  
(406) 616-3058  
[danahy.molly@gmail.com](mailto:danahy.molly@gmail.com)

Sonni Waknin\*  
10300 Venice Blvd. # 204  
Culver City, CA 90232  
732-610-1283  
[sonniwaknin@gmail.com](mailto:sonniwaknin@gmail.com)

**For Plaintiff-Intervenors:**

/s/ Gary Bledsoe  
Gary Bledsoe  
The Bledsoe Law Firm PLLC  
6633 Highway 290 East #208  
Austin, TX 78723  
(512) 322-992  
[gbledsoe@thebledsoelawfirm.com](mailto:gbledsoe@thebledsoelawfirm.com)

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 14th day of May, 2025.

/s/ Nina Perales  
Nina Perales